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*Designated Resident Nevada Counsel
for Plaintiff Kristine Kerlus*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KRISTINA KERLUS, individually,

Plaintiff,

vs.

DR. JENNIFER CORNEAL, in her individual
capacity; A. SANTOS, in her individual
capacity; CITY OF LAS VEGAS, a Municipal
corporation; COUNTY OF CLARK,
a Municipal corporation; LAS VEGAS
METROPOLITAN POLICE DEPARTMENT,
jointly and severally,

Defendants.

Case No.: 2:24-cv-02352-NJK

**DECLARATION OF CORY A. SANTOS
IN SUPPORT OF MOTION TO
WITHDRAW AS RESIDENT NEVADA
COUNSEL**

I, Cory A. Santos, declare and state as follows:

1. I am a partner with the law firm Santos Law, PLLC, and am admitted to practice in all
Nevada State and Federal Courts.

2. I make this declaration in support of the instant Motion to Withdraw. The statements
contained herein are based on my own personal knowledge unless otherwise stated to be based
on information and belief. I could and would competently testify to the matters stated herein if
called to testify.

3. Attached as Exhibit 1 is correspondence from attorney Patrick Driscoll, dated
December 18, 2024, re his representation of Plaintiff.

4. Attached as Exhibit 2 is correspondence from Santos Law acknowledging Mr.

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1 Driscoll's correspondence re representation.

2 5. Attached as Exhibit 3 is December 18, 2024 correspondence from Attorney Romanucci
3 requesting proof of representation.

4 6. Attached as Exhibit 4 is correspondence from Attorney Mueller to Attorney
5 Romancucci re statute of limitations concern.

6 7. Attached as Exhibit 5 is correspondence from Attorney Romanucci to Santos Law re
7 demand to stop representation.

8 8. Attached as Exhibit 6 is December 19, 2024 correspondence from Attorney Romanucci
9 to Santos Law re instructions to file Amended Complaint.

10 9. Attached as Exhibit 7 is December 31, 2024 correspondence from Attorney Mueller to
11 Attorney Romanucci re intention to file substitution of attorney.

12 10. Attached as Exhibit 8 is Santos Law's January 6, 2025 inquiry to Attorney Romanucci
13 re intention regarding representation.

14 11. Attached as Exhibit 9 is Attorney Romanucci's out of office reply

15 12. Attached as Exhibit 10 is Santos Law's January 13, 2025 inquiry to Attorney
16 Romanucci re intention re representation.

17 13. Attached as Exhibit 11 is Santos Law's January 28, 2025 inquiry to Romanucci &
18 Blandin re attempt to resolve representation issue.

19 14. Attached as Exhibit 12 is an out-of-office reply from Romanucci & Blandin to Santos
20 Law's January 28, 2025 status inquiry.

21 15. Attached as Exhibit 13 is Santos Law's February 4, 2025 correspondence to
22 Romanucci & Blandin re attempt to resolve representation issue.

23 I declare under penalty of perjury under the laws of the United States and the State of
24 Nevada that the foregoing is true and correct.

25 Executed this 13th day of March, 2025.

26 /s/ Cory A. Santos, Sr.

27 Cory A. Santos, Sr.